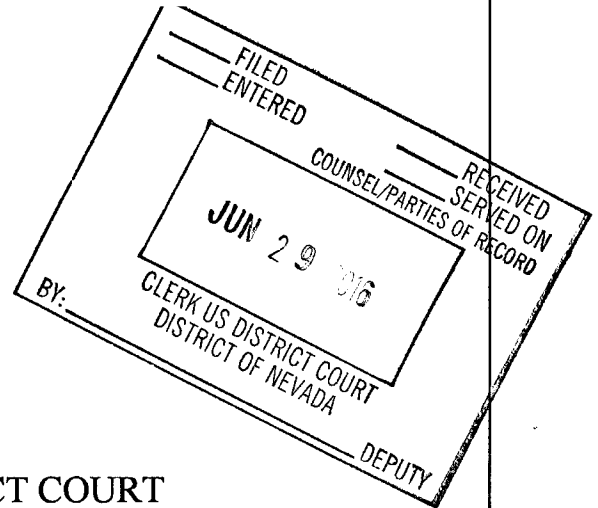


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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL STEVEN SANDFORD,

Defendant.

Case No: 2:16-cr-198

CRIMINAL INDICTMENT

VIOLATION:

18 U.S.C. § 922(g)(5) and 924(a)(2) –
 Illegal Alien in Possession of a Firearm

18 U.S.C. § 1752(a)(2) and (b)(1)(A) –
 Impeding or Disrupting Government Business
 or Functions

THE GRAND JURY CHARGES THAT:

COUNT 1

(Illegal Alien in Possession of a Firearm)

On or about June 17, 2016, in the State and Federal District of Nevada,

MICHAEL STEVEN SANDFORD,

defendant herein, then being an alien illegally and unlawfully in the United States, did knowingly possess a firearm; to wit: a Glock 9 millimeter handgun bearing an unknown serial number, said possession being in and affecting interstate commerce and said firearm having been shipped and transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(5) and 924(a)(2).

COUNT 2

(Illegal Alien in Possession of a Firearm)

On or about June 18, 2016, in the State and Federal District of Nevada,

MICHAEL STEVEN SANDFORD,

defendant herein, then being an alien illegally and unlawfully in the United States, did knowingly possess a firearm; to wit: a Glock 9 millimeter handgun bearing serial number VUH314, said possession being in and affecting interstate commerce and said firearm having been shipped and transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(5) and 924(a)(2).

COUNT 3

(Impeding and Disrupting Government Business Official Functions)

On or about June 18, 2016, in the State and Federal District of Nevada,

MICHAEL STEVEN SANDFORD,

defendant herein, did knowingly and with intent to impede and disrupt the orderly conduct of Government business and official functions, engage in disorderly and disruptive conduct in and within such proximity to a restricted building where Donald J. Trump, who was then receiving protection from the United States Secret Service, was temporarily visiting, when and so that such conduct did in fact impede and disrupt the orderly conduct of Government business and an official function, by attempting to seize a police officer's handgun, and, during and in relation to the offense, did use a firearm, to wit: a Glock 9 millimeter handgun.

All in violation of Title 18, United States Code, Section 1752(a)(2) and (b)(1)(A).

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1 **DATED:** this 29th day of June, 2016.

2 **A TRUE BILL:**

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5 DANIEL G. BOGDEN
United States Attorney

/S/
FOREPERSON OF THE GRAND JURY

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8 JARED L. GRIMMER
Assistant United States Attorney
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